Appl. No.:   09/997,340
Amdt. dated January 7, 2004
Reply to Office action of October 17, 2003

REMARKS/ARGUMENTS

Applicants acknowledge receipt of the Office Action dated October 17, 2003. In that action the Examiner rejected all the claims as allegedly obvious over *Sanschagrin* (U.S. Patent No. 6,295,540).

Applicants believe the pending claims are allowable over the art of record, and respectfully request reconsideration.

I.   AMENDMENTS TO THE SPECIFICATION

With this Response, Applicants amend paragraphs [0017], [0018] and [0027] of the specification. Each of these amendments is to address grammatical deficiencies. These amendments do not present new matter.

II.   CLAIM REJECTIONS

The Office Action dated October 10, 2003, rejects all the pending claims as allegedly obvious over *Sanschagrin*. Applicants respectfully traverse the rejections.

Sanschagrin is directed to alignment of trunk integrated record keeping system (TIRKS) data using an integrated network manager (INM). *See Sanschagrin* Title; Abstract. *Sanschagrin*'s Figure 1 is reproduced below for convenience of the discussion:

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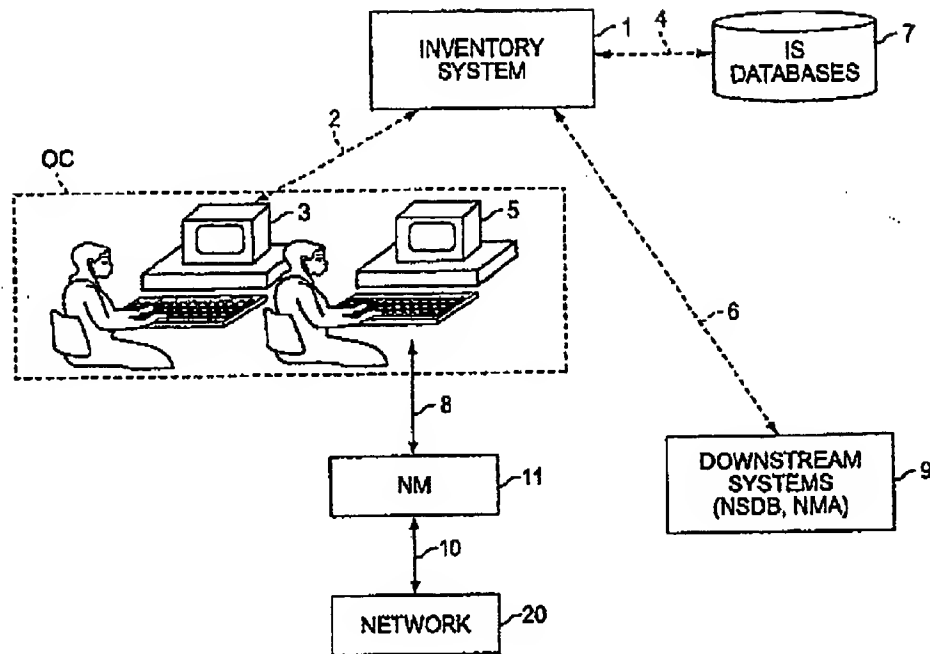Reply to Office action of October 17, 2003

FIG. 1

The method of *Sanschagrin* is described as follows:

> Step 1. Use INM connection inventory to display, on terminal 5, the actual HICAP facility under investigation.
>
> Step 2. Use TIRKS to display, on terminal 3, the equivalent information using the "SONET Grid" display.
>
> Step 3. Do a "stare and compare" to detect deviations in the TIRKS inventory data.
>
> Step 4. If a deviation is detected, decide the proper update(s) required to correct the TIRKS record(s) to reflect the actual network configuration displayed by INM.
>
> Step 5. Using the network element ID, and channel assignment from INM, use TIRKS to determine the corresponding relay rack number. This information is required to `post` the update to TIRKS.
>
> Step 6. Post an update to TIRKS using the "Circuit Description" screen on terminal 3.

Sanschagrin Col. 5, lines 9 – 26. Notice how a first batch of Information Is provided by the integrated network manager about the HICAP facility (step 1), and the second batch of information is provided from the trunk integrated record

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keeping system (step 2). No physical inventory is done. The information appears to be simply drawn up on respective terminals.   The fact that no physical inventory is done follows directly from where *Sanschagrin* discloses placing of the operators:

> An operator in the operating center OC uses a TIRKS terminal 3 for inputting commands recognized by the TIRKS system, to get the inventory information.
>   Operating center OC is also provided with an NM terminal 5 that interactively presents to the user graphical images of various aspects of the network 20. ...
>   Currently, the operators that are co-located preferably in the same operating center, detect discrepancies between the information presented by the INM 11 on terminal 5 and the presented by TIRKS 3.

Sanschagrin Col. 4, lines 43 – 64; Figure 1.

While *Sanschagrin* may disclose displaying information provided by the integrated network manager, and also displaying information by the trunk integrated record keeping system, neither of these steps appears to teach copying of the asset management database. Moreover, *Sanschagrin* teaches a "stare and compare" method of finding discrepancies.

By contrast, claim 1 requires, *inter alia*, taking a physical inventory and creating a copy of the asset management database. *Sanschagrin* does not teach or fairly suggest these limitations.

In further contrast to *Sanschagrin*, Claim 18 requires scanning, with a hand held scanner, bar codes identifying locations and assets to create inventory data, and transferring the inventory data from the hand held scanner to the web server. *Sanschagrin* does not teach or fairly suggest use of a hand held scanner, and therefore cannot teach that the data within the hand held scanner should be transferred to a web server.

Claim 29, which depends from claims 18 and 28, requires that prior to copying of the asset management database an identifying indicia is placed on a portion of each record. Claim 30 requires updating the asset management database with records without the identifying indicia. Claim 31 requires

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identifying assets that were not found during the physical inventory by searching for records of assets in the asset management database that still have the identifying indicia: significantly different than the "stare and compare" teachings of *Sanschagrin*. Applicants respectfully submit that *Sanschagrin* does not teach or fairly suggest these limitations.

Claim 34 requires, *inter alia*, placing identifying indicia on each seat record in the asset management database, writing seat records (associated with assets) to the asset management database without identifying indicia, and identifying assets not found during a physical inventory by seat records still having the identifying indicia. Applicant's respectfully submit that *Sanschagrin's* "stare and compare" method of finding discrepancies does not teach or fairly suggest these steps.

Based on the forgoing, Applicants respectfully submit that all the pending claims are allowable over *Sanschagrin*.

III.   CONCLUSION

Applicants respectfully request reconsideration and allowance of the pending claims.   If the Examiner feels that a telephone conference would expedite the resolution of this case, he is respectfully requested to contact the undersigned.
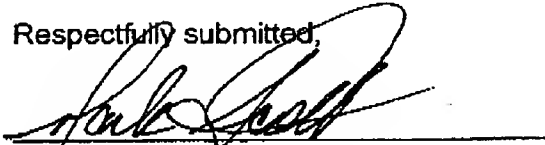
In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may be other distinctions between the claims and the prior art which have yet to be raised, but which may be raised in the future.

If any fees or time extensions are inadvertently omitted or if any fees have been overpaid, please appropriately charge or credit those fees to Hewlett-Packard Company Deposit Account Number 08-2025 and enter any time extension(s) necessary to prevent this case from being abandoned.

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        Applicants respectfully request that a timely Notice of Allowance be issued

in this case.

                              Respectfully submitted,

                              _____
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